

FEB 23 1993

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

VERILINK CORPORATION)

Petition for Rulemaking to Amend)
the Commission's Part 68 Rules)
to Authorize Regulated Carriers)
to Provide Certain Line Build Out)
Functionality as a Part of Regulated)
Network Equipment on Customer Premises)

RM No. 8158

Reply Comments of the
Telecommunications Industry Association
User Premises Equipment Division

The User Premises Equipment Division of the Telecommunications Industry Association hereby submits its reply comments in support of the petition for rulemaking referenced above filed by Verilink Corporation. The User Premises Equipment Division of TIA represents 149 manufacturers of telecommunications products for use by the private, commercial or government customer including all wireline telecommunications equipment which are not a part of the public network such as telephones, facsimile machines, private branch exchanges, interfaces, cables, plugs and jacks. As the principal industry association representing the customer premises equipment ("CPE") manufacturing industry, the Division has a direct interest in and is well qualified to address the issues raised by Verilink's petition. For the reasons outlined below, TIA supports Verilink's petition and the proposed rulemaking proceeding that would establish such an amendment.

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Verilink requests in its petition that the Commission amend its Part 68 rules to authorize line build out ("LBO") functionality to be provided in the transmission path of 1.544 Mbps ("DS-1") services as a component of regulated network interface equipment located on customer premises. According to Verilink, permitting regulated carriers to provide LBO in the DS-1 transmission path will eliminate the need for the customer/carrier "joint engineering" process that is currently necessary to adjust LBO levels at installation. Verilink states that the rule amendment will eliminate a source of unnecessary user confusion and expense, as well as alleviate the network harm that arises from customer misadjustments of LBO settings.

TIA agrees that allowing carriers to provide LBO in the DS-1 transmission path will minimize customer problems that often arise in adjusting the LBO settings of CPE interface devices. Carriers (and sometimes vendors) must respond to customer service requests at the time of installation from users who need assistance in selecting appropriate LBO settings for their equipment. In the real-world, practical experience of our members, the need for customers and carriers (and sometimes manufacturers) to confer in a "joint engineering" process is inconvenient to users and frequently leads to customer dissatisfaction with the CPE products. For carriers (and vendors), the process is time-consuming and unnecessarily costly.


The need for customers to adjust LBO settings can also impair the quality of service to other users to the extent that users misadjust LBO settings and inadvertently

launch excessive signals into the network. The inconvenience and confusion associated with the "joint engineering" process also discourages the use of DS-1 services by smaller business users who may otherwise be unfamiliar with DS-1 services.

TIA supports the rule amendment proposed in the Verilink petition because it would eliminate the need for a "joint engineering" process and substantially simplify installation of DS-1 facilities. The amendment would also facilitate the implementation of the ANSI DS-1 Metallic Interface standard to the benefit of users, CPE manufacturers and carriers. TIA does not expect that permitting carrier-provision of LBO will result in increased costs to CPE customers or any material adverse affect on CPE vendors or the CPE market.

Respectfully Submitted,

Telecommunications Industry Association

By: 
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Dated: February 23, 1993

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing REPLY COMMENTS OF THE TELECOMMUNICATIONS INDUSTRY ASSOCIATION in RM-8158, was served by first class United States mail, postage prepaid, on each of the parties indicated on the service list shown below and attached, this 23rd day of February 1993.


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